Chief District Judge Ricardo S. Martinez

2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE 8 WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 JANE DOE, et al., CASE NO. 2:21-cv-1274-RSM JOINT STIPULATION AND 11 Plaintiffs, **EXTENDING DEADLINE** 12 v. Noted for consideration on: 13 November 29, 2021 UNITED STATES DEPARTMENT OF 14 HOMELAND SECURITY, et al., 15 Defendants. 16 17 Plaintiffs brings this litigation pursuant to the Mandamus Act seeking, inter alia, to 18 compel the U.S. Citizenship and Immigration Services ("USCIS") and the Department of State 19 ("DOS") to complete consular processing and issue travel documents for Plaintiff Beneficiaries 20 of Plaintiff Jane Doe, who have approved I-730 petitions. Dkt. No. 1. Defendants' response to 21 the Complaint is currently due on or before December 3, 2021. The Parties respectfully request a 22 90-day extension of the deadline to allow for possible resolution of the litigation without further 23 litigation. 24

The cases are currently at the National Visa Center awaiting the scheduling of consular

interviews at the U.S. Embassy in Kinshasa, Democratic Republic of Congo. This process has

been delayed due to COVID-19-related operational restrictions and resulting backlogs of cases

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1	since DOS suspended routine visa services worldwide on March 20, 2020.
2	https://travel.state.gov/content/travel/en/News/visas-news/suspension-of-routine-visa-
3	services.html. Plaintiff reports that Plaintiff Beneficiaries have recently been contacted about
4	scheduling their interviews.
5	To allow Defendants time to schedule the interviews abroad, the Parties, through their
6	counsel, jointly request that the Court extend the deadline for Defendants to respond to the
7	Complaint until March 3, 2022. The parties agree that this is an acceptable timeframe and
8	recognize the possibility that this process may moot Plaintiffs' claims in their entirety.
9	DATED this 29th day of November 2021.
10	Respectfully submitted,
11	NICHOLAS W. BROWN
12	United States Attorney
13	s/ Michelle R. Lambert
14	MICHELLE R. LAMBERT, NYS #4666657 Assistant United States Attorney
15	United States Attorney's Office
	1201 Pacific Avenue, Suite 700
16	Tacoma, WA 98402 Phone: 253-428-3824
17	Fax: 253-428-3826
18	Email: michelle.lambert@usdoj.gov
10	Counsel for Defendants
19	s/ Minda A. Thorward
20	MINDA A. THORWARD, WSBA #47594
21	Thorward Immigration Law, PLLC 5600 C Ranier Ave. S, Ste 208
22	Seattle, WA 98118
	Phone: 206-607-7976 Fax: 206-580-4860
23	Email: thorwardlaw@gmail.com
24	Counsel for Plaintiffs
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1 | **ORDER** The Parties having so stipulated and agreed, the Court hereby ORDERS that Defendants' deadline to respond to the Complaint is extended to March 3, 2022. DATED this 30th day of November, 2021. RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE